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UNITED STATES DISTRICT COURT  
 DISTRICT OF NEVADA

UNITED STATES OF AMERICA ,  
  
 Plaintiff,  
  
 v.  
 CLAUDIA ANN MERRILL,  
  
 Defendant.

2:20-CR-001-JCM-BNW

**Government's Unopposed Motion To  
 Extend the Time to File its Responses  
 Regarding Forfeiture and Restitution  
 regarding Merrill's sentencing  
 memorandum, ECF No. 37, and Order  
 (First Request)**

The United States of America respectfully moves this Court for an Order extending the time to file the government's response regarding forfeiture until December 2, 2020, and the government's response regarding restitution until December 3, 2020, to Claudia Ann Merrill's (Merrill) sentencing memorandum. Both are due December 1, 2020. This is the first request.

The grounds for extending the time are as follows.

On Sunday November 29, 2020, at 9:30 pm, Merrill filed a sentencing memorandum, challenging the criminal forfeiture money judgment of \$1,775,412.79 and restitution relating to offsets or credits.<sup>1</sup>

The undersigned has a large and active case load. He was informed on November 30, 2020, at night that his use or love annual leave was cancelled so that he could address the restitution and forfeiture credit or offset issue and argue the issues at Merrill's sentencing

<sup>1</sup> Merrill's Sentencing Memorandum (MSM), ECF No. 37.

1 on Friday, December 4, 2020. Undersigned began drafting the forfeiture response on  
2 December 1, 2020, and has not completed it. Undersigned has worked extremely hard and  
3 efficiently to meet both deadlines, but he has not had time to complete the forfeiture  
4 response and has not started the restitution response.

5 On December 1, 2020, the undersigned counsel called Sanford A. Schulman,  
6 counsel for defendant, who agreed to these extensions of time.

7 This Motion is not submitted solely for the purpose of delay or for any other  
8 improper purpose.

9 This Court should grant an extension of time to, and including, December 2, 2020,  
10 for the United States to file its forfeiture and an extension of time to, and including  
11 December 3, 2020, to file its restitution response.

12 DATED: December 1, 2020.

13 NICHOLAS A. TRUTANICH  
14 United States Attorney

15 /s/ Daniel D. Hollingsworth  
16 DANIEL D. HOLLINGSWORTH  
17 Assistant United States Attorney

18  
19 IT IS SO ORDERED:  
20

21  
22 James C. Mahan  
23 JAMES C. MAHAN  
24 UNITED STATES DISTRICT JUDGE

25 DATED: December 2, 2020  
26  
27  
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